

**REMARKS**

This application has been carefully reviewed in view of the above-referenced Office Action, and reconsideration is requested in view of the following remarks.

**Regarding the Rejections under 35 U.S.C. §103****The Colligan Reference**

The Colligan reference is the primary reference used in all rejections in this action. In particular, the process described in col. 7, lines 35-59 describing the process of Fig. 7, and col. 11, lines 48-57 are pointed out as teaching portions of Applicants' claims.

It is first noted that in the process of Fig. 7, as described in Colligan, is a "multi-layer encryption process". In Colligan, content is pre-encrypted at the source using single DES encrypted and then later double DES encrypted at the server (the order of single or double DES encryption may be reversed). The resulting content is, therefore, triple encrypted. That is, the content is encrypted to produce first encrypted content. The first encrypted content is then encrypted again so that it is double encrypted. The double encrypted content is then encrypted again to produce triple encrypted content.

Colligan states at col. 7, lines 56-59 that "As long as the subscriber station has the three keys required, it will be able to fully decrypt (706) the triple-DES encryption to obtain the unencrypted video program". Hence, in order for the user to access the encrypted content, three separate keys must be used to decrypt, then decrypt again, then decrypt a third time the encrypted content. This process differs dramatically from the claimed invention and in no way teaches or suggests the process carried out as claimed.

Applicants' claims call for a single segment to be duplicated so that each copy is encrypted individually. There is no sequential encryption of the same data so that multiple keys are required to decrypt. Only one key (either of two) is needed to decrypt according to Applicants's claimed invention.

In specific response to this action, claims 1-3 and 5-10 have been cancelled without prejudice. Claims 2, 4 and 11 have been amended to change the dependencies thereof. Claim 12, however, is analogous to original claim 2, hence leading to redundant claims. The

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cancellation of claims 2, 3, and 5-10 are merely for the purposes of eliminating redundant claims. New apparatus claims 23-31 are added by this amendment and contain features analogous to those to be discussed below, but cast in apparatus format.

Consider each element of claim 12 (which is representative of the remaining claims for purposes of addressing this rejection) as follows:

1	A method of processing digital video content, wherein the digital video content comprises intra-coded frames and inter-coded frames, the method comprising:	
2	duplicating the intra-coded frames;	No teaching or suggestion in Colligan, Nardone, or Simec taken singly or in combination of duplication of the intra-coded frames.
3	selecting a plurality of the intra-coded frames for encryption to produce selected frames;	Nardone only teaches selection of BTUs (which may be an I frame) for single selective encryption.
4	encrypting the selected frames under a first encryption algorithm to produce first encrypted frames;	See 5
5	encrypting the duplicates of the selected frames under a second encryption algorithm to produce second encrypted frames;	Applicants' claims require that multiple sets of encrypted frames be created – a first set of the selected frames are encrypted under the first encryption algorithm while the duplicates of the selected frames are encrypted under the second encryption algorithm. This is neither taught nor suggested by Colligan, Nardone, or Simec taken singly or in combination.
6	storing the inter-coded frames in a first file;	See 8
7	storing the intra-coded frames, whether encrypted under the first encryption algorithm or unencrypted, in a second file; and	See 8
8	storing the intra-coded frames, whether encrypted under the second encryption algorithm or unencrypted, in a third file.	As best Applicants can determine, neither Colligan, Nardone, or Simec singly or in combination, disclose the file storage

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	arrangement using three separate files as claimed. The use of the three specified files facilitates VOD server based trick play modes as further claimed in certain of the dependent claims (e.g., claims 17 and 18, for example).
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In view of the above, it is submitted that claims 12 – 22 (which all contain similar features to those discussed above) are not obviated by the cited combination of art in view of the requirements of MPEP 2143.03 which requires that all claim limitations must be taught or suggested in order to establish *prima facie* obviousness. The above clearly establishes that certain of the claim features have not been fully and properly considered. Hence, it is submitted that all claims are in condition for allowance.

Applicants further submit that claim 1 distinguishes over the cited art at least for the art's failure to disclose the claimed storage arrangement. However, claim 1 and those dependent thereon are cancelled hereby without prejudice to simplify the issues and expedite allowance of the remaining claims.

New claims 23-31 are submitted herewith. Each claim has features similar to those discussed above, but they are cast as apparatus claims. Hence, it is believed that minimal new consideration is needed to address these claims.

#### Concluding Remarks

The undersigned additionally notes that many other distinctions exist between the cited art and the claims. However, in view of the clear distinctions pointed out above, further discussion is believed to be unnecessary at this time. Failure to address each point raised in the Office Action should accordingly not be viewed as accession to the Examiner's position or an admission of any sort.

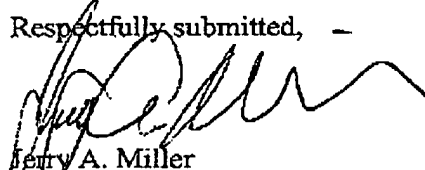
No amendment made herein was related to the statutory requirements of patentability or for the purpose of narrowing the scope of any claim unless an argument has been made herein that such amendment has been made to distinguish over a particular reference or combination of references. In view of this communication, reconsideration is respectfully requested. All claims

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are believed to be in condition for allowance and such is respectfully requested at an early date.

In the event the Examiner feels that the current arguments do not address all rejections fully and render the claims patentable, the undersigned the undersigned respectfully requests the courtesy of an interview, either in person or telephonic at the Examiner's convenience. The undersigned can be reached at the telephone number below.

Respectfully submitted, -

  
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